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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

ERICA FRASCO, et al.,

Plaintiffs,

v.

FLO HEALTH, INC., GOOGLE LLC,
 FACEBOOK, INC., and FLURRY, INC.,

Defendants.

CASE NO. 3:21-cv-00757-JD (consolidated)

AMENDED JOINT TRIAL WITNESS LIST

Judge: Honorable James Donato
 Date Filed: June 25, 2025
 Trial Date: July 21, 2025

1 In accordance with the Standing Order for Civil Trials Before Judge James Donato,
 2 the parties submit the following Amended Joint Trial Witness List as Exhibit A. This list
 3 includes witnesses who are likely to be called at trial (other than solely for impeachment or
 4 rebuttal purposes), including a brief statement describing the substance of the testimony to be
 5 given by each witness and an estimate of time the witness's testimony is expected to take (direct
 6 and cross).

7 In order to streamline the presentation of evidence at trial, and to minimize the
 8 inconvenience for all witnesses, the parties propose that each witness be called to testify only one
 9 time, such that a witness who would otherwise be called in both the plaintiffs' and defendants'
 10 case need not testify multiple times. The listing of witnesses on Exhibit A does not waive
 11 any objections a party may have to such witness's testimony, in whole or in part.

12 Dated: June 25, 2025

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Counsel for Defendant Meta Platforms, Inc.
(formerly known as Facebook, Inc.)

EXHIBIT A

1. Plaintiffs' Case in Chief¹

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
1.	Plaintiff Erica Frasco	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.	0.5-0.75 (Flo)
2.	Plaintiff Sarah Wellman	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.	0.8 (Google) 0.8 (Meta) 0.5-0.75 (Flo)
3.	Plaintiffs' Expert Jennifer Golbeck	Expert	Qualifications and background; Flo's use of SDKs; How Meta and Google advertising business works; Meta and Google's use of data; Meta's use of Flo Custom App Event data; Google's use of Flo Custom App Event data; explain documents reviewed and conclusions reached in expert report	4 hrs.	2 (Google) 2 (Meta) 1.5-2.5 (Flo)
4.	Plaintiffs' Expert Serge Egelman	Expert	Qualifications and background; SDKs; Custom App Events; How the Flo app works; Flo App User Data transmitted to Defendants; non-consent for sharing data; explain documents	4 hrs.	1 (Google) 2 (Meta)

¹ To avoid duplication, witnesses are only listed once. If not called in Plaintiffs' case, Defendants would call witnesses listed in this section, including in the "Additional Witnesses" subsection, in their own case. If Plaintiffs call a witness in their case who Meta or Google would otherwise would have called in their cases, it is Meta's and Google's position that the parties should confer on examination format to avoid the need to recall the witness later unless necessary.

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
			reviewed and conclusions reached in expert report		1.5-2.5 (Flo)
5.	Google's Witness Kevin Lam	Product Manager	<p><u>Plaintiffs</u>: Role and responsibilities; receipt and use of Flo User Data through SDKs or APIs data retention policy ; use of data from SDKs; Google's advertising platforms/algorithms; authentication of Google documents</p> <p><u>Google</u>: The Flo App's use of the Google Analytics for Firebase and Fabric SDKs, and the functionality of the Fabric SDK.</p>	2 hrs.	<p>0.1-0.2 (Flo)</p> <p>1.5 (Google)</p>
6.	Google's Witness Steve Ganem	Director of Product Management	<p><u>Plaintiffs</u>: Role and responsibilities re: Google Analytics; use of data from SDKs and Google's advertising platforms/algorithms; development and features of Google Analytics; data collected through Google Analytics; data privacy and storage; Flo's use of Google Analytics; Custom App Events; authentication of Google documents</p> <p><u>Google</u>: The functionality of Google Analytics ("GA"), including the Google Analytics for Firebase ("GA4F") SDK, and terms and policies applicable to GA4F.</p>	2 hrs.	<p>0.1-0.2 (Flo)</p> <p>2 (Google)</p>
7.	Meta's Witness Tobias Woolridge	Software Engineer	Past/present role and responsibilities; Facebook SDK and advertising platforms/algorithms; Flo's use of Facebook SDK and data transmitted; Meta's use of data received from Flo; Meta integrity system; policies and/or procedures re: sensitive data; ad targeting and	2 hrs.	<p>0.1-0.2 (Flo)</p> <p>2 (Meta)</p>

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
			delivery optimization; data retention policy; authentication of Meta documents		
8.	Meta's Witness Anh Bui* ²	Product Manager	Past/present role and responsibilities; Facebook SDK and advertising platforms/algorithms; standard and custom app events; ad privacy and safety; authentication of Meta documents	2 hrs.	0.1-0.2 (Flo) 0.5 (Meta)
9.	Flo's Witness Dmitry Gurski ³	CEO	<u>Plaintiffs</u> : Role and responsibilities during Class Period; How the Flo App works; what was the purpose of the app; use of the Meta and Google SDK and purpose; contracts with third parties on use of Flo app data; authentication of Flo documents <u>Meta</u> : Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.	2 hr.	0.3 (Google) 0.5 (Meta)
10.	Flo's Witness Max Scrobov	Chief Product Officer	<u>Plaintiffs</u> : Past/present role and responsibilities; data collected from Flo App Users; use of SDKs; How the Flo App works; what was the purpose of the app; use of the Meta and Google SDK and purpose; contracts with third parties on use of Flo app data; authentication of Flo documents	2 hrs.	0.3 (Google) 0.25 (Meta)

² Asterisks are used to denote those witnesses whose testimony Meta believes could be more efficiently covered by trial testimony from Fred Leach and Goksu Nebol-Perlman. See Dkt. No. 606, Defendant Meta Platforms, Inc.'s Opposition to Plaintiffs' Motion to Exclude Witnesses Fred Leach and Goksu Nebol-Perlman from Testifying at Trial at 1-3, 5-6. These witnesses are listed conditionally in the event that Meta is not permitted to call Mr. Leach and Ms. Nebol-Perlman.

³ Flo submits that any Flo witness should be called in Defendants' case in chief and sets forth its pertinent estimated exam times below.

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
11.	Flo's Witness Roman Bugaev	CTO	<p><u>Plaintiffs</u>: Past/present role and responsibilities; How the Flo App works; what was the purpose of the app; use of the Meta and Google SDK and purpose; contracts with third parties on use of Flo app data; authentication of Flo documents</p> <p><u>Meta</u>: Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.</p>	2 hr.	0.3 (Google) 0.5 (Meta)
<u>Total Time Estimates (in hours):</u>				26	29.55
Additional Witnesses⁴					
12.	Plaintiff Jennifer Chen	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.	0.8 (Google) 0.8 (Meta) 0.5-0.75 (Flo)
13.	Plaintiff Tesha Gamino	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm	2 hr.	0.8 (Google) 0.8 (Meta) 0.5-0.75 (Flo)
14.	Plaintiff Autumn Meigs	Plaintiff	Use of Flo App and nature of data entered; understanding and belief that information would not be shared with others, including	2 hr.	0.5-0.75 (Flo)

⁴ At this stage Plaintiffs do not intend to call all Additional Witnesses and will work to narrow the witness list prior to trial. Plaintiffs reserve their right to call Additional Witnesses.

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
			Meta and Google; privacy was violated; no knowledge of WSJ article or ability to discover harm		
15.	Google's Witness Maria Volchenok** ⁵	Sales Manager	Role and responsibilities re: Flo; communications with Flo; review of Flo ads; How the Flo App works; what was the purpose of the app; use of the Meta and Google SDK and purpose; contracts with third parties on use of Flo app data; authentication of Google documents	2 hrs.	0.1-0.2 (Flo) 0.8 (Google)
16.	Google's Witness Ben Ewing**	Senior Staff Linguist	Past/present role and responsibilities; use of data from SDKs and Google's advertising platforms; authentication of Google documents	2 hr.	0.1-0.2 (Flo) 0.8 (Google)
17.	Google's Witness Alicia Cahill**	App Specialist	Past/present role and responsibilities; use of data from SDKs and Google's advertising platforms; authentication of Google documents	2 hr.	0.1-0.2 (Flo) 0.5 (Google)
18.	Google's Witness Tameem Mohsin**	Global Product Lead, App Campaigns	Past/present role and responsibilities; use of data from SDKs and Google's advertising platforms; authentication of Google documents	2 hr.	0.1-0.2 (Flo) 0.5 (Google)
19.	Google's Witness Evgenia Olerinskaya**	Industry Manager Export	Past/present role and responsibilities; use of data from SDKs and Google's advertising platforms; authentication of Google documents	2 hr.	0.8 (Google)
20.	Google's Witness Evan Huang**	Software Engineer	Past/present role and responsibilities; authentication of Google documents	2 hr.	0.5 (Google)
21.	Meta's Witness Anjali Dahiya	Director, Regulatory Readiness, Strategic	Past/present role and responsibilities; Facebook SDK and nature of data collected; Custom App Events; privacy and data practices; user consent to the collection and use of personal data; Flo's	2 hrs.	0.1-0.2 (Flo) 2 (Meta)

⁵ Google reserves all rights with respect to the witnesses denoted with two asterisks (**), including to object to or move to strike those witnesses, whom no party has previously disclosed in this case.

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
		Programs	use of Facebook SDK and transmission of data; investigation by NY State Dept. of Financial Services; authentication of Meta documents		
22.	Meta's Witness Wei Liu*	Software Engineering Manager	Past/present role and responsibilities; Facebook SDK; Flo's use of the Facebook SDK and data transmitted; data retention and deletion; Meta personal integrity system; authentication of Meta documents	2 hrs.	0.1-0.2 (Flo) 0.5 (Meta)
23.	Flo's Witness Susanne Schumacher	Independent Consultant	<u>Plaintiffs</u> : Past/present role and responsibilities; departments/teams at Flo; collection and use of data provided by Flo App Users; data privacy; transmission of Flo App User data to third parties; authentication of Flo documents	2 hrs.	0.3 (Google) 0.25 (Meta)
24.	Flo's Witness Eugene Tiunovich	Head of User Acquisition	Past/present role and responsibilities; promotion of Flo App and use of advertising platforms; tracking Flo App Users; use of the Flo app; authentication of Flo documents	2 hrs.	0.3 (Google) 0.25 (Meta)
25.	Flo's Witness Kate Romanovskaia	Chief Brand & Communications Officer	Role and responsibilities during Class Period; authentication of Flo documents	2 hr.	0.2 (Meta) 0.2 (Google)
26.	Flo's Witness Timofei Savitski	Chief Legal & Compliance Officer at Flo Health Inc	Role and responsibilities during Class Period; use of the Flo app; authentication of Flo documents	2 hr.	0.2 (Meta) 0.3 (Google)
27.	Flo's Witness Alexei Azarov	Analytics Manager	Role and responsibilities during Class Period; use of the Flo app; authentication of Flo documents	2 hr.	0.3 (Google) 0.25 (Meta)

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
28.	Flo's Witness Tamara Orlova	CFO	<u>Plaintiffs</u> : Role and responsibilities during Class Period; use of the Flo app; authentication of Flo documents <u>Meta</u> : Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.	2 hr.	.25 (Meta) 0.3 (Google)
29.	Flo's Witness Valeriya Silenkova	Head of Support	Role and responsibilities during Class Period; use of the Flo app; authentication of Flo documents	2 hr.	0.2 (Meta) 0.2 (Google)
30.	Meta's Witness Karan Shah [testimony by business records declaration, if plaintiffs agree]	Data Science Manager	<u>Plaintiffs</u> : Meta's use of data received from Flo for advertising purposes; authentication of Meta documents <u>Meta</u> : Flo's advertising through the creation of Mobile App Custom Audiences; and other information related to Flo's ad campaigns.	2 hr.	0.75 (Meta)
31.	Google's Witness Oscar Takabvirwa	Ads & Content Investigation Manager	<u>Plaintiffs</u> : Google's use of data received from Flo; authentication of Google Interrogatory response <u>Google</u> : Google Ads content classification and its effect on Google Analytics data.	2 hr.	0.8 (Google)
Total Time Estimates (in hours):				40	21.15
Authentication Witnesses⁶					

⁶ The Parties have had productive discussions regarding potential agreements on authenticity which may make it unnecessary to call some or all of the witnesses listed under in the section: Authentication Witnesses.

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
32.	Flurry Witness Bisera Ferrero	Head of Engineering	Authentication of Flurry documents	2 hr.	
33.	Flurry Witness Nathalie Owen	Engineer	Authentication of Flurry documents	2 hr.	
34.	Google Witness Brian** Kennedy	Software Engineer	Authentication of Google documents	2 hr.	0.5 (Google)
35.	Google Witness Morgan Kennedy**	Product Manager	Authentication of Google documents; Google's response to FTC investigation	2 hr.	0.5 (Google)
36.	Meta Witness Katy Dormer ⁷	Communications Director	Authentication of Meta documents; Meta's response to WSJ article	2 hr.	0.25 (Meta)
37.	Meta Witness Susan Glick ⁸	Communications	Authentication of Meta documents; Meta's response to WSJ article	2 hr.	0.25 (Meta)
38.	Flo Witness Vladislav Zhukov	Engineer	Authentication of Flo documents; Flo's sharing of user data	2 hr.	0.2 (Google)
39.	Flo Witness Darya Palianskaya	Engineer	Authentication of Flo documents; Flo's sharing of user data	2 hr.	0.2 (Google)
40.	Flo's Witness Arvid Bismont	Business Development	Authentication of Flo documents; Flo's sharing of user data	2 hr.	0.2 (Google)
41.	Meta Custodian	Employee	Authentication of Documents	2 hr.	0.25 (Meta)
42.	Google Custodian	Employee	Authentication of Documents	2 hr.	0.3 (Google)
43.	Flo Custodian	Employee	Authentication of Documents	2 hr.	
44.	Bayer Custodian	Employee	Authentication of Documents	1 hr.	
45.	P&G Custodian	Employee	Authentication of Documents	1 hr.	
46.	NYSDFS Custodian	Employee	Authentication of Documents	1 hr.	
47.	FTC Custodian	Employee	Authentication of Documents	1 hr.	

⁷ Meta reserves all rights with respect to this witness, including to object to or move to strike this witness, whom no party has previously disclosed in this case.

⁸ Meta reserves all rights with respect to this witness, including to object to or move to strike this witness, whom no party has previously disclosed in this case.

	Witness	Title	Description of Anticipated Testimony	Plaintiffs' Time Estimate (in hours)	Defendants' Time Estimate (in hours)
48.	Certified Translator ⁹	Translator	Translation of Documents and Testimony	2 hr.	
<u>Total Time Estimate (in hours):</u>				30	2.65

This list contains Plaintiffs' current, good faith list of witnesses Plaintiffs are likely to call during their case-in-chief. Plaintiffs reserve the right to amend this list or the times allotted for witnesses in the event the set of participating witnesses or the scope of issues or claims to be tried changes, if any witness becomes unavailable, or in light of new information that becomes known. Plaintiffs further reserve the right to withdraw any witnesses currently included on their list. Plaintiffs further reserve the right to call any other witness for impeachment or in rebuttal and to examine any witness designated or called by another party. Additionally, Plaintiffs disagree with Defendant Flo Health's position on Plaintiffs' ability to call Flo Health witnesses in their case-in-chief.

2. Defendants' Case-in-Chief

	Witness	Affiliation	Description of Anticipated Testimony	Defendants' Time Estimate (in hours)	Plaintiffs' Time Estimate (in hours)
1.	Anna Klepchukova	Flo	<u>Flo</u> : Dr. Klepchukova will testify to the operation of the Flo science and research team and its input into the content and services provided by the Flo app; Flo's business model and organizational structure; how the functionality of the Flo app has changed; Flo's	.5 (Meta) 1.5-2 (Flo) .5 (Google)	1.5

⁹ The Parties have had productive conversations regarding an agreement on translation that is likely to make it unnecessary to call a translator.

	Witness	Affiliation	Description of Anticipated Testimony	Defendants' Time Estimate (in hours)	Plaintiffs' Time Estimate (in hours)
			objectives and priorities; Flo's strategic choices; and Flo's third-party agreements. <u>Meta:</u> Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.		
2.	Laure Lydon	Flo	<u>Flo:</u> Ms. Lydon will testify to an overview of the Flo app's functionality, including but not limited to (i) the technical features of the Flo app and how those technical features allowed the Flo app to share analytic data with the analytics companies on a deidentified and encrypted basis and the aggregated dashboards that Flo received in return, (ii) Flo's use of neutral libraries of code and app event naming, (iii) Flo's adherence to privacy standards; (iv) Flo's consent screens with links to privacy policies and terms of use, (v) those terms themselves, and (vi) the integration of code and functionality into the Flo app; and topics addressed in her deposition. <u>Meta:</u> Flo's use of the Facebook SDK, including its use of App Events via Facebook SDK.	.5 (Meta) 1.5-2.5 (Flo) .5 (Google)	2
3.	Dmitry Gurski	Flo	<u>Flo:</u> Mr. Gurski will testify to the content and services provided by the Flo app; an overview of Flo's practices in the collection, use, and	1.5 (Flo)	3.

	Witness	Affiliation	Description of Anticipated Testimony	Defendants' Time Estimate (in hours)	Plaintiffs' Time Estimate (in hours)
			sharing of data; Flo's business model; the founding of the Flo app; how the functionality of the Flo app has changed; Flo's culture, objectives, and priorities; Flo's strategic choices; and Flo's privacy policies, terms of service, and third-party agreements.		
4.	Max Scrobov	Flo	<u>Flo</u> : Mr. Scrobov will testify to Flo's practices in the collection, use, and sharing of data, including as it relates to analytics data; Flo's strategic choices; Flo's founding; Flo's commitment to privacy; Flo's engagement and discussions with third-parties; how the functionality of the Flo app has changed; how the Flo app integrates with third parties; Flo's strategy and business model; Flo's response to media and regulatory inquiries; how users interface with the Flo app; the content and services provided by the Flo app; Flo's privacy policies and terms of use; and topics addressed in his deposition.	1.2 (Flo)	4.
5.	Roman Bugaev	Flo	<u>Flo</u> : Mr. Bugaev will testify to an overview of the mechanics of the Flo app, including how analytics data was shared with the analytics companies on a deidentified and encrypted basis and the dashboards Flo received in return; Flo's rationale for using SDKs; the different versions of the Flo app; Flo's organization and	1.2 (Flo)	5.

	Witness	Affiliation	Description of Anticipated Testimony	Defendants' Time Estimate (in hours)	Plaintiffs' Time Estimate (in hours)
			leadership; Flo's leadership in privacy; the programming of the Flo app; and topics addressed in his deposition.		
6.	Susanne Schumacher	Flo	<u>Flo</u> : Ms. Schumacher, Flo's 30(b)(6), will testify to Flo's privacy policies, terms of use, data protection agreements, and practices; Flo's competitors; the interface of the Flo app and Flo's communications with users; Flo's engagements with third-parties; Flo's adoption of industry best practices for privacy and security; Flo's compliance with requirements; Flo's response to media and regulatory inquiries; and topics addressed in her deposition.	1.2 (Flo)	6.
7.	Tamara Orlova	Flo	<u>Flo</u> : Ms. Orlova will testify to Flo's business model and financials, including but not limited to forgone revenue streams; Flo's priorities and objectives; and third-party agreements.	0.75-1.25 (Flo)	7.
8.	Lorin Hitt	Flo's Expert	<u>Flo</u> : Dr. Hitt will testify to the opinions set forth in his expert report in this case, including but not limited to the fact that the at-issue data/information did not have economic value to anyone, including the putative class members or any of the defendants; and topics addressed in his deposition.	1.5-2.5 (Flo) .5 (Meta) .5 (Google)	2

	Witness	Affiliation	Description of Anticipated Testimony	Defendants' Time Estimate (in hours)	Plaintiffs' Time Estimate (in hours)
9.	Jim Karkanias	Flo's Expert	Mr. Karkanias will testify in anticipated rebuttal to the expert testimony of Dr. Serge Egelman, including but not limited to those rebuttal opinions that are identified in his rebuttal expert report in this case; and topics addressed in his deposition.	1-1.5 (Flo) .5 (Meta) .5 (Google)	1.5
10.	Brianna Arroyo*	Meta	Flo's and other third-party advertisers' use of the Facebook SDK, Facebook's Ads Manager, and the ways in which advertisers utilize Meta's analytics and advertising services.	.5 (Meta)	.5
11.	Oleksii Bagdasarov*	Meta	Flo's and other third-party advertisers' use of the Facebook SDK, Facebook's Ads Manager, and the ways in which advertisers utilize Meta's analytics and advertising services.	.5 (Meta)	.5
12.	Edward Dendievel*	Meta	Flo's use of the Facebook SDK and Facebook's Ads Manager.	1 (Meta)	.5
13.	Tatiana Frantsuzenko*	Meta	Flo's use of the Facebook SDK and Facebook's Ads Manager.	1 (Meta)	.5
14.	Alex Lapitski	Meta	Third-party advertisers' (including Flo's) use of the Facebook SDK and creation of Custom App Events; Flo's advertising campaigns through Meta.	1.5 (Meta)	.75
15.	Fred Leach	Meta	Meta's Business Tools, including the Facebook SDK; Meta's Business Tools Terms; how and why advertisers use Meta's tools; Meta's	3 (Meta)	2

	Witness	Affiliation	Description of Anticipated Testimony	Defendants' Time Estimate (in hours)	Plaintiffs' Time Estimate (in hours)
			signals integrity systems; and Meta's policies applicable to advertisers and developers.		
16.	Goksu Nebol-Perlman	Meta	Meta's privacy-related initiatives; Meta's signals integrity systems and mitigation efforts; Meta's efforts to exclude health data; Meta's policies applicable to its users.	2.5 (Meta)	2
17.	Julia Onuchina*	Meta	Third-party advertisers' (including Flo's) use of the Facebook SDK, Facebook's Ads Manager, and the ways in which advertisers utilize Meta's advertising services.	0.5 (Meta)	.5
18.	Steve Satterfield	Meta	Meta's Business Tools, including the Facebook SDK; Meta's privacy-related initiatives; and Meta's policies applicable to advertisers and developers as well as its own users.	2 (Meta)	1.5
19.	Vasyl Sergiienko*	Meta	Third-party advertisers' (including Flo's) use of the Facebook SDK, Facebook's Ads Manager, and the ways in which advertisers utilize Meta's advertising services.	0.5 (Meta)	.5
20.	Jingwei Zheng*	Meta	Meta's signals integrity systems and mitigation efforts.	0.5 (Meta)	.5
21.	Bo Zhu*	Meta	Flo's use of App Events via the Facebook SDK.	0.5 (Meta)	.5

	Witness	Affiliation	Description of Anticipated Testimony	Defendants' Time Estimate (in hours)	Plaintiffs' Time Estimate (in hours)
22.	Georgios Zervas	Defendants' Expert	SDKs and how developers may benefit from their use; SDKs that Flo used; how those SDKs, and the Facebook and Google SDKs operated; what types of data may have been transmitted by the Flo App using those SDKs; rebutting Serge Egelman's and Jennifer Golbeck's testimony; the opinions contained in Dr. Zervas's expert reports; and the topics addressed in Dr. Egelman's deposition.	3 (Meta) 2 (Google) 1.5-2.5 (Flo)	4.5
<u>Total Time Estimates (in hours):</u>				31.5 (high end)	21.3

This list contains Defendants' current, good faith list of witnesses Defendants are likely to call during their cases-in-chief (to the extent not listed under Plaintiffs' case-in-chief, *see* n.1). Defendants disclosed and/or designated deposition testimony of other witnesses who Defendants currently do not anticipate calling. That said, Defendants reserve the right to call any witness who was previously disclosed for potential trial testimony, if necessary, after Plaintiffs' witnesses testify. Defendants reserve the right to call a custodian of records for Flo, AppsFlyer, Flurry, Google, and Meta, and to call corporate witnesses to testify regarding corporate history and records. Defendants reserve the right to amend this list or the times allotted for witnesses in the event the set of participating plaintiffs or the scope of issues or claims to be tried changes, if any witness becomes unavailable, or in light of new information that becomes known. Defendants further reserve the right to withdraw any witnesses currently included on their list. Defendants further reserve the right to call any other witness for impeachment or in rebuttal and to examine any witness designated or called by another party.